

MICHELLE D. ALARIE, ESQ.
Nevada Bar No. 11894
ARMSTRONG TEASDALE LLP
3770 Howard Hughes Parkway, Suite 200
Las Vegas, Nevada 89169
Telephone: 702.678.5070
Facsimile: 702.878.9995
malarie@armstrongteasdale.com

DANIEL O'TOOLE, ESQ. (will comply with LR IA 11-2 within 45 days)
Missouri Bar No. 38051
ARMSTRONG TEASDALE LLP
7700 Forsyth Boulevard, Suite 1800
St. Louis, Missouri 63105
Telephone: 314.621.5070
Facsimile: 314.621.5065
dotoole@armstrongteasdale.com

*Attorneys for Defendant Keefe Commissary Network,
LLC*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

JOHANA REYES,

Plaintiff,

vs.

KEEFE GROUP, LLC and DOE Defendants
I-X,

Defendants.

Case No.: 3:18-cv-00004-LRH-WGC

**UNOPPOSED MOTION TO EXTEND
DEFENDANT'S DEADLINE TO RESPOND
TO COMPLAINT AND
ORDER**

[FIRST REQUEST]

Defendant Keefe Commissary Network, LLC (incorrectly identified in the Complaint as Keefe Group, LLC) ("Keefe"), by and through its counsel, Armstrong Teasdale LLP, hereby respectfully requests an extension of Keefe's deadline to respond to the Complaint from February 7, 2018, to **March 5, 2018**. Plaintiff Johana Reyes ("Reyes") has consented to the requested extension. This is the first request to extend this particular deadline.

On January 4, 2018, Reyes filed her Complaint against Keefe alleging claims for sexually hostile work environment, disability discrimination, and retaliation. *See* ECF No. 1. The Summons

1 and Complaint were served on Keefe on January 17, 2018. *See* ECF No. 4. Therefore, pursuant to
2 Rule 12(a) of the Federal Rules of Civil Procedure, Keefe's response to the Complaint is due on
3 February 7, 2018.

4 On February 5, 2018, undersigned counsel contacted Reyes' counsel to discuss stipulating to
5 extend Keefe's response deadline. Reyes' counsel agreed to continue Keefe's answer deadline from
6 February 7, 2018, to March 5, 2018. Counsels, however, were not able to agree on language for a
7 stipulation, therefore, Keefe files this unopposed motion.

8 Good cause for this extension exists. Counsel for Keefe was recently retained, and therefore,
9 requires additional time to adequately review and consider this matter in anticipation of responding
10 to the Complaint. This short extension will not prejudice any parties nor affect any current deadlines
11 because this case is still in its infancy – no parties have answered the Complaint and a case
12 management order had not been entered. This stipulation is entered into in good faith and is not
13 intended to unduly delay the proceedings.

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 Accordingly, Keefe requests that an order be entered extending the deadline for Keefe to
2 respond to the Complaint from February 7, 2018, to **March 5, 2018**.

3
4 Dated this 7th day of February, 2018.

ARMSTRONG TEASDALE, LLP

5
6 By: /s/ Michelle D. Alarie
MICHELLE D. ALARIE, ESQ.
7 Nevada Bar No. 11894
3770 Howard Hughes Parkway, Suite 200
8 Las Vegas, Nevada 89169
Telephone: 702.678.5070
9 Facsimile: 702.878.9995
malarie@armstrongteasdale.com

10 DANIEL O'TOOLE, ESQ.
11 Missouri Bar No. 38051
7700 Forsyth Boulevard, Suite 1800
12 St. Louis, Missouri 63105
dotoole@armstrongteasdale.com

13
14 *Attorneys for Defendant Keefe Commissary
Network, LLC*

15
16
17 **ORDER**

18 **IT IS SO ORDERED.**

19 William G. Cobb

20 UNITED STATES MAGISTRATE JUDGE

21 DATED: February 7, 2018